

**MININNO LAW OFFICE**

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**UNITED STATES OF AMERICA and the  
STATES OF NEW JERSEY and NEW  
YORK, ex rel. KENNETH W.  
ARMSTRONG,**

**Plaintiffs and Relator,**

**v.**

**ANDOVER SUBACUTE AND REHAB  
CENTER SERVICES ONE, INC.;  
ANDOVER SUBACUTE AND REHAB  
CENTER SERVICES TWO, INC,  
ESTATE OF DR. HOOSHANG  
KIPIANI; DR. SANJAY JAIN; and DR.  
BORIS FREYMAN,**

**Defendants.**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**Civil Action No.: 12-cv-03319**

**[PROPOSED]  
ORDER OF UNSEALING**

THIS MATTER having been opened to the Court on *ex parte* application by John R. Mininno, attorney for plaintiff, for an Order Unsealing the Complaint; and the Court having considered the application, and having previously entered an Order dismissing the matter as to the Dr. Boris Freyman, and good cause having been shown, the Court rules as to the Remaining Defendants as follows:

IT IS on this 21<sup>ST</sup> date of September, 2017 ORDERED that:

1. The Complaint and any Amended Complaints shall be unsealed and served upon the Remaining Defendants by the Relator;

2. All other contents of the Court's file in this action shall remain under seal and not be made public or served upon any Defendant, except for this Order and the United States' Notice of Election to Decline to Intervene, which the Relator shall serve upon the Remaining Defendants only after serving the Complaint;

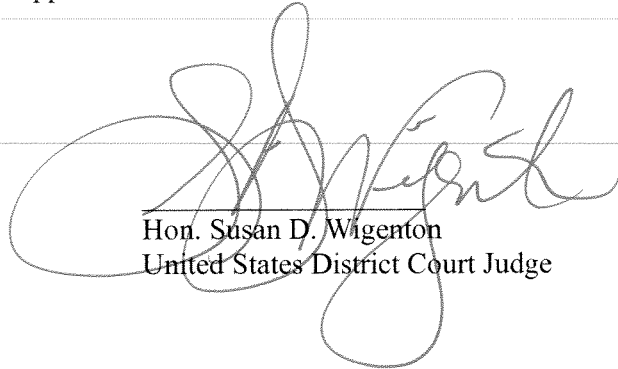
3. The seal shall be lifted as to all other matters occurring in this action after the date of this Order:

4. The parties shall serve all pleadings and motions filed in this action, including supporting memoranda, upon the United States, as provided for in 31 U.S.C. § 3730(c)(3). The United States may order any deposition transcripts and is entitled to intervene in this action, for good cause, at any time;

5. The parties shall serve all notices of appeal upon the United States;

6. The Clerk shall provide copies of all Orders of this Court to the United States; and

7. Should the Relator or the Remaining Defendants at some point propose that this action be dismissed, settled or otherwise discontinued, the Court will solicit the written consent of the United States before ruling or granting its approval.



Hon. Susan D. Wigenton  
United States District Court Judge